

### REMARKS

Claims 48-75 were pending in this application prior to the outstanding Office Action. Claims 1-47 were previously cancelled. Claims 48-75 remain pending in this application.

The Examiner has rejected claims 48-75 under 35 U.S.C. §102(e) as being anticipated by Barker (U.S. Pat. No. 6,715,147) (Method and System for Interfacing a Plurality of Applications Conforming to a Standard).

#### ***Informal Contact with Examiner***

In between interviews of other cases in TC 2100, the Examiner informally mentioned that he had found additional art that he might assert in a future office action. We did not discuss the art or the claims, as no interview was scheduled or conducted and counsel had not seen the art. The Examiner has since identified the additional references as WIDL, presumably from W3C, and Olson, U.S. Pat. No. 6,519,642, but there has been no discussion of those references.

#### ***Rejection Under 35 U.S.C. § 102(e) of Claims 48-75***

The Examiner rejects **claims 48-75** under 35 U.S.C. § 102(e) as anticipated by Barker (U.S. Pat. No. 6,715,147).

Applicants respectfully submit that the Examiner has conducted many searches and has not afforded applicants to bring prosecution to a conclusion by overcoming the art of record. We hope that one last final supplemental search will put us in a position to identify allowable subject matter and get this case issued.

#### Claim 48

**Claim 48** includes the limitations:

*maintaining a registry of machine-readable specifications specifying business services offered by trading partners, the machine-readable specifications including at least one of definitions of, and references to definitions of, services offered and at least one of definitions of, and references to definitions of, documents to be exchanged with such services by trading partners; and*

*providing, in response to a request, one or more of the machine-readable specifications from said registry via a communication network to a requesting node.*

These limitations are not found in Barker.

One have in mind the technical advance that Barker disclosed, when considering the words of the disclosure. Barker explained, succinctly, in column 4,

[F]or the sake of simplicity, the invention will be described with respect to three products available from International Business Machines corporation (IBM). IBM has three different products that provide the same basic imaging services functions but designed for different levels of need, they are: VisuallInfo, ImagePlus 400 and ImagePlus MVS. ... **By creating a Java interface in a special way**, programs can be written to access, for example, any of the three IBM products separately or all at the same time.

Of interest in this case is whether the claimed registry of machine-readable specifications specifying business services offered by trading partners, including at least references to definitions of documents to be exchanged is part of Barker's special Java interface?

Barker's Java interface does not read on the claim limitation. First, it is an object interface, not a document interface. The declarations previously submitted make it clear that prior art objects were generally not documents. See, *Decls. Tennenbaum and Carter*. Second, there is no registry. Third, there are no services offered by trading partners. Because there is no document interface, there are no definitions of documents to be exchanged.

The Examiner refers to several passages of Barker: Abstract; Figs. 3, 4; col. 1, lines 14 - 41; col. 2, lines 3 - 9; col. 3, lines 28 - 37; col. 4, lines 13 - 32; col. 5, lines 9 - 16. However, the Examiner does not which passages supply which features. Instead, the Examiner cuts and pasts the same string cite in every place that he need a citation.

The Abstract does not meet the claim limitations. The Examiner cites the Abstract as meeting every single limitation of every claim (OA at 2-5.) The Abstract is three sentences long. "Multiple applications that conform to a standard are accessed by a single computer. An abstract class is created with defined Data Objects and desired functions. For each of the services that will conform to the standard interface, subclasses of the abstract class are then created." It does not meet any element of any claim. Even the word "services" is not used in a context that provides a written description of the same services that are claimed.

Figures 3-4 are flow charts of manual process, entitled "Process to develop an API that can access several services at the same time" and "Creating Service Specific Subclasses from an Abstract Class." Again, the Examiner cites these flow charts as meeting every element of every claim (OA at 2-5.) Again, they do not meet any element of any claim. Neither the API or the specific subclasses of an abstract claim relate to the claimed subject matter.

Column 1, lines 14-41 are part of the background section directed to describing problems, not innovative technology or solutions.

Column 2, lines 3-9 refer to creating an abstract class with defined data objects and then subclasses that implement services. While the Examiner cites this passage as meeting every element of every claim (OA at 2-5), it does not meet any element.

Column 3, lines 28-37 mentions mainframe computers in different states, which has no apparent relevance to these claims.

Column 4, lines 13-32 include the passage that we cited on the prior page to distinguish the thrust of Barker from anything claimed in this case.

Finally, the Examiner cites column 5, lines 9-16. The cited paragraph gives some directions regarding naming of DLLs to permit loading of multiple DLLs at the same time:

(1) In the subclass, define some of the functions to call C functions (these are called Java Native Functions). When doing this, also identify which DLL to load and get the C functions from. Because of this freedom to name the DLL, all the subclasses could have identical code but simply load a different DLL. Because the DLL names are different, the Java program can access all of the different systems at the same time. Java keeps track of the different DLLs that are needed for the Java programmer.

This passage has no apparent relevance to these claims.

Having reviewed every passage cited by the Examiner as well as the reference as a whole, it is clear that Barker does not anticipate claim 48.

Therefore, claim 48 should be allowable over Barker.

#### Claim 49

**Claim 49** includes the limitations:

*wherein said machine-readable specifications comprise data identifying respective descriptions of sets of storage units and logical structures for the sets of storage units*

These limitations are not found in Barker. As Barker does not include any definitions of documents to be exchanged, this refinement is not present in Barker either.

Therefore, claim 49 should be allowable over Barker.

#### Claim 50

**Claim 50** includes the limitations:

*wherein said machine-readable specifications included data adapted for parsing to identify an input document and one or more transactions which accept said input document*

These limitations are not found in Barker. There is no mention of parsable data or of identifying transactions that accept a particular input document in any of the passages cited by the Examiner. Barker, taken as a whole, has nothing to do with this limitation.

Therefore, claim 50 should be allowable over Barker.

#### Claim 51

**Claim 51** includes the limitations:

*wherein the definitions of the documents to be exchanged comprise respective descriptions of sets of storage units and logical structures for the sets of storage units*

These limitations are not found in Barker. Barker makes no mention of defining documents to be exchanged in XML or any similar language.

Therefore, claim 51 should be allowable over Barker.

#### Claims 52-54

**Claims 52-53 and 57** include the limitations:

*wherein the machine-readable specifications include documents compliant with a definition of a predefined document including logical structures for storing an identifier of a particular transaction, and at least one of definitions and references to definitions of input and output documents for the particular transaction*

*wherein the storage units comprise parsed data*

*wherein the storage units comprise unparsed data*

These limitations are not found in Barker. As Barker does not include any definitions of documents to be exchanged, this refinement is not present in Barker either.

Therefore, claims 52-53 and 57 should be allowable over Barker.

Claim 58

**Claim 58** includes the limitations:

*including associating trading partners with said machine readable specifications*

These limitations are not found in Barker which does not have trading partners, machine readable specifications or any association between the two.

Therefore, claim 58 should be allowable over Barker.

Claims 54-56 and 59-75

**Claims 54-56 and 59-75** include many more limitations than the character data encoding and markup data identifying limitations to which Examiner refers to on page 5 of the office action. For instance, claim 59 is a device claim that includes:

*a data processor coupled to the memory and the network interface which executes programs of instructions; wherein the programs of instructions include*

*logic to provide, in response to a request received at the network interface, one or more of the machine-readable specifications from said registry via a communication network to a requesting node*

Similar limitations are found in independent claim 65. These limitations are not found in Barker and the OA does not read Barker on these limitations.

Independent claim 74 includes many limitations not addressed in the office action.

Therefore, for the reasons given above and because additional elements of the claims are not met by Barker and the OA does not read Barker on the additional elements, claims 54-56 and 59-75 should be allowable over Barker.

Applicants respectfully submit that claims 48-75 should be allowable over Barker.

**CONCLUSION**

It is respectfully submitted that this application is now in condition for allowance, and such action is requested. If the Examiner believes a telephone conference would aid the prosecution of this case in any way, the undersigned can ordinarily be reached at his office at (650) 712-0340 from 8:30 a.m. to 5:30 p.m. PST, Monday through Friday, or can be reached at his cell phone at (650) 902-6112 most other times.

***Fee Authorization.*** The Commissioner is hereby authorized to charge any additional fee determined to be due in connection with this communication, or credit any overpayment, to our Deposit Account No. 50-0869 (OIN 1006-2).

Respectfully submitted,

Dated: November 3, 2006

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/Ernest J. Beffel, Jr./

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